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5 IN THE UNITED STATES DISTRICT COURT
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7FOR THE NORTHERN DISTRICT OF CALIFORNIA
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12IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:
ALL CASES**DECLARATION OF TIFFANY R. ELLIS
IN SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE FILED UNDER SEAL**13
14 I, Roopal P. Luhana, declare:15 1. I am a partner of Chaffin Luhana, LLP, an attorney licensed in the State of New
16 York, and duly admitted to practice before this Court *pro hac vice*, representing Plaintiffs in the
17 above caption action. I make this declaration based on my own personal knowledge. If called
18 upon to testify, I could and would testify competently to the truth of the matters stated herein.19 2. Because the materials at issue were designated confidential by Uber, Plaintiffs
20 filed the following under seal:

21 Document	22 Description	23 Designating Party
22 Portions of Plaintiffs' Letter Regarding Defendants' Responses to Plaintiffs' Bellwether Discovery Requests	23 References to information deemed confidential	24 Uber
25 Exhibit 1 to Plaintiffs' Letter Regarding Defendants' Responses to Plaintiffs' Bellwether Discovery Requests	26 References to information deemed confidential	27 Uber

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed this 26th day of May, 2025 in Brooklyn, New York.

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5 */s/ Roopal P. Luhana*
6 Roopal P. Luhana

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